

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 08/04/2022

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ANNABI,

Plaintiff,

-v-

NEW YORK UNIVERSITY STERN SCHOOL OF  
BUSINESS,

Defendant.  
-----X

22-cv-03795 (LJL)

ORDER

LEWIS J. LIMAN, United States District Judge:

On August 4, 2022, my Chambers received the attached email from Plaintiff Karim Annabi asking for an extension to reply to Defendant's motion to dismiss and to amend the complaint. Pursuant to Paragraph 1(D) of the Court's Individual Practices (effective June 17, 2022), all requests for extensions must be filed on ECF as letter-motions. As a result, the Court cannot consider this request.

SO ORDERED.

Dated: August 4, 2022  
New York, New York



LEWIS J. LIMAN  
United States District Judge

## Liman NYSD Chambers

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**From:** Karim Annabi <karim.annabi@gmail.com>  
**Sent:** Thursday, August 4, 2022 3:48 PM  
**To:** Liman NYSD Chambers  
**Cc:** Temporary Pro Se Filing NYSD; DiPalma, Joseph (White Plains)  
**Subject:** 1:22-cv-03795-LJL Annabi v. New York University Stern School of Business - Deadline Extension Request

CAUTION - EXTERNAL:

Dear Judge Liman,

Thank you for the deadlines clarification and order in the matter of Attorney Sibanda's bizzare attempt to attack my reputation and sabotage my case with slander and misrepresentation of facts.

In regards to the upcoming deadlines, I kindly request a two month extension to reply to the motion to dismiss and amend the complaint. This is my first request for a deadline extension. The defendant was previously granted an extension for their reply and they have responded favorably to my email informing them of my desire to request a deadline extension. My reasons are the following, the defendant has submitted 176 pages of dense legal exhibits in small font. From the little I have read so far the legal opinions in these exhibits do not support the defendant's position, and thus require a time consuming review to point out their flaws. One example is a partial dismissal of fraud claims in a free Model competition/contest because Models do not represent the general public. In my case, as the evidence shows, the paid NYU competition is open to the general public, anyone can be an entrepreneur or participate on a team with an entrepreneur and small businesses are also consumers. Secondly, I have two cross-Atlantic trips today, August 4th, and August 17th and other time consuming commitments in August that I cannot get out of. Thirdly, there have been delays in collecting relevant evidence in this case which I plan to submit with my revised complaint.

In regards to Attorney Sibanda, while this matter has been put to rest and I don't won't take up the court's time in correcting his many wrong facts about me, I feel it necessary to at least provide some context for our dispute to dispel any notions that I start frivolous legal proceedings:

### BEFORE THE CONSULTATION

Annabi: "Would you consider on contingency? I don't have a legal budget."

Sibanda: "How about we do this. I will give a consult for \$125." (Reduced from \$200)

"With me, I draft the complaint and you pay filing fee."

Despite the discount, Annabi pays the full price as a gesture of good will.

### AFTER THE CONSULTATION

Sibanda creates retainer agreement with contingency AND thousands of dollars in retainer fees to draft the complaint that increase at every step of the case. Annabi complains about the bait and switch, but Sibanda denies wrong doing.

Thank you in advance for your consideration.

Regards,

Karim Annabi  
Plaintiff

> On Aug 2, 2022, at 10:56 AM, Karim Annabi <karim.annabi@gmail.com> wrote:

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>

> Dear Judge Liman's Chambers,

>

> I received guidance from the NYLAG to write to you and kindly request clarification on my deadlines as a foreign-based party in this case to file an amendment to the complaint and to file a memorandum of law in opposition to the defendant's motion to dismiss. Thanks in advance for your help.

>

> Regards,

>

> Karim Annabi

> Plaintiff

>

>

CAUTION - EXTERNAL EMAIL: This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.